

LAW OFFICES OF
ROOKS, PITTS, FULLAGAR AND POUST
208 SOUTH LA SALLE STREET
CHICAGO 60604

*File U.S. Steel
Joliet. will Co.*

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312-372-5600

November 10, 1976

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ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

KEMPER K. KNAPP 1897-1903
KNAPP, HAYNIE AND CAMPBELL 1904-1903
KNAPP AND CAMPBELL 1903-1927
KNAPP, BEYE, ALLEN, COCHRAN
AND CUSHING 1930-1933
KNAPP, BEYE, ALLEN AND CUSHING 1933-1937
KNAPP, ALLEN AND CUSHING 1937-1942
KNAPP, CUSHING, HERSHBERGER
AND STEVENSON 1943-1954
STEVENSON, CONAGHAN, VELDE
AND HACKBERT 1954-1956
STEVENSON, CONAGHAN, HACKBERT,
ROOKS AND PITTS 1958-1966
HACKBERT, ROOKS, PITTS,
FULLAGAR AND POUST 1966-1974

PAUL R. CONAGHAN
HARLAN L. HACKBERT
ERWIN E. SCHULZE
JOSEPH S. WRIGHT
OF COUNSEL

Mr. Jeffrey R. Diver
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706



Re: U. S. Steel Corporation, Joliet Works,
Application for Pollution Control Bond
Financing

Dear Mr. Diver:

Enclosed please find three signed copies of the affidavit of Mr. S. P. Curtis, Vice President-Engineering of United States Steel Corporation, pursuant to the guidelines of the Illinois Environmental Protection Agency for certification of the water pollution control facilities being built at Joliet Works in order to obtain pollution control bond financing through the Illinois Industrial Pollution Control Bond Financing Authority. I am forwarding this to you pursuant to John Bernbom's suggestion that it would be the most expeditious way of obtaining the necessary certification. If there are any questions, please call me at once.

We greatly appreciate the Agency's prompt attention to this matter as it is necessary to process the financing application as quickly as possible in order to finance and complete the facilities at Joliet Works by July 1, 1977, the date agreed to and set forth in the National Pollutant Discharge Elimination System Permit.

Very truly yours,

James T. Harrington
James T. Harrington

Enclosures

cc: Mr. John T. Bernbom, W/encd

WALTER E. JACKSON
ASSOCIATE DIRECTOR
ENVIRONMENTAL CONTROL—WEST



600 GRANT STREET
PITTSBURGH, PENNSYLVANIA 15230

November 8, 1976

Illinois Environmental Protection Agency
Suite 1205
Intercontinental Center
1701 South First Avenue
Maywood, Illinois 60153

Subject: Illinois Industrial Pollution
Control Financing Authority
Pollution Control Revenue Bonds
United States Steel Corporation Project
Joliet Plant

Dear Sirs:

Attached hereto is an Affidavit as required by your Agency in connection with our request that you certify certain facilities to be financed by the Illinois Industrial Pollution Control Financing Authority. The proposed facilities are covered by IEPA Permit No. 1976-EB-158-COP. If you require any further information on these facilities, please advise me as soon as possible. The Corporation desires to sell the bonds in mid-December of this year. Therefore, we will be happy to supply you with any information that will expedite the issuance of your Certificate stating that these facilities are in furtherance of abating or controlling water pollution.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. E. Jackson".

Attachment

S. P. Curtis, being first duly sworn, deposes and says that he is Vice President-Engineering of United States Steel Corporation (the "Corporation") and that he has knowledge of the matters herein stated, and further deposes and says as follows:

(a) United States Steel Corporation is a Delaware corporation having its principal place of business at 600 Grant Street, Pittsburgh, Pennsylvania 15230 and with its principal office in Illinois being located at 208 South LaSalle Street, Chicago, Illinois 60690.

(b) The following is a list of each and every Illinois Facility owned or controlled by the Corporation and subject to the requirements of the Illinois Environmental Act and Regulations adopted pursuant thereto.

Joliet Plant
927 Collins Street
Joliet, Illinois 60432

Cyclone Fence Operations
Waukegan Plant
P.O. Box 440
Waukegan, Illinois 60085

Waukegan Plant
P. O. Box 440
Waukegan, Illinois 60085

Universal Atlas Cement Division
Summit Distribution Station
P. O. Box 382
Argo, Illinois 60502

South Works
3426 East 89th Street
Chicago, Illinois 60617

Universal Atlas Cement Division
Willow Street Warehouse
1412-1414 W. Willow St.
Chicago, Illinois 60622

U. S. Steel Products Div.
14700 Harvard Avenue
Dolton, Illinois 60419

USS Agri-Chemicals
Chicago Heights
P. O. Box 337
10th & State Streets
Chicago Heights, Illinois 60411

U. S. Steel Supply Division
1649 North Throop Street
Chicago, Illinois 60622

U. S. Steel Supply Division
P. O. Box 7310
Chicago, Illinois 60680

USS Agri-Chemicals
East St. Louis
P. O. Box 312
East St. Louis, Illinois 62202

U. S. Steel Supply Division
41st St. & Railroad Avenue
Moline, Illinois 61265

USS Agri-Chemicals
Riverdale
1200 West 138 St.
Riverdale, Illinois

(c) The following is a list of all Agency or NPDES permits applied for, the subject matter for each permit and the current status of such applications or permits.

Joliet Plant

1. NPDES Permit No. IL 0002674.
2. The wastewater treatment plant is covered by IEPA permit No. C-48-76.
3. IEPA air emission operating permits have been issued for the following facilities:

a) No. 1 Rod Mill	02090335
b) No. 2 Rod Mill	"
c) No. 3 Rod Mill	"
d) Radiant Tube Annealing	"
e) Boiler House	"
f) Waste Treatment Furnace	"
g) Bundling Room Lectro Dryer	"
h) Continuous Annealing	04070100
i) Nail Bluer	04070247
j) No. 2 Splice Mill	04070248
k) No. 8 Splice Mill	04070249
l) No. 9 Splice Mill	04070250
m) Aluminum Galvanizing	04080155
n) No. 3 Galvanizing Line	04080159
o) No. 4 Galvanizing Line	04080160
p) No. 5 Galvanizing Line	04080161

4. IEPA air emission operating permits have been applied for but not received on the following facilities:

a) No. 1 Nail Galvanize	04080156
b) No. 2 Nail Galvanize	04080157
c) No. 3 Nail Galvanize	04080158
d) Cleaning House	04110019

5. The additional wastewater treatment facilities which are the subject of this application are covered by IEPA permit No. 1976-EB-158-COP.

Waukegan Plant

1. NPDES Permit No. IL 0002682 - effective.
2. IEPA wastewater permit No. 1975-NP-2345-OP issued November 4, 1975, expires August 1, 1980.
3. IEPA wastewater treatment plant construction permit No. 1975-EE-1289-COP issued October 20, 1975.
4. IEPA air emission operating permits have been issued for the following facilities:
 - a) Nos. 4 and 5 Boilers 04030059
 - b) Nos. 6, 7, and 8 Boilers 04020004
 - c) Eight Surface Combustion Furnaces 04090086
 - d) Eleven Lee Wilson Combustion Furnaces 04060035
 - e) Rod Patenting 05010139
 - f) Stainless Steel Heat Treating 05030100

South Works

1. NPDES Permit No. IL 0002691 - effective.
2. IEPA air emission operating permits have been issued or applied for for the following facilities. For those facilities marked with an asterisk, the permits have been rejected and will be revised and resubmitted.
 - a) Nos. 1, 4 and 5 Boilers 02090203, 02090206, 02090207
 - b) No. 2 Boiler 02090204
 - c) No. 3 Boiler, Air Plant 02090202
 - d) Nos. 1 and 2 Boilers, Air Plant * 02090201, 02090200
 - e) Blast Furnaces * 03110127
 - f) No. 4 Electric Furnace Shop * 03110009
 - g) 100 Ton Electric Furnace R04050012
 - h) BOP Shop * 03110180
 - i) Foundry * -
 - j) Sinter Plant * 05050147
 - k) Rod Mill Reheat Furnace C308005
 - l) 53 inch Mill Soaking Pits 04010080
 - m) 44 inch Mill, all except Stainless 04060073
 - n) 44 inch and 96 inch Mills 04010083
Reheating Furnaces

U. S. Steel Agri-Chemicals - Chicago Heights Facility

An IEPA air emission operating permit No. 031045 AAM has been granted for the production facilities.

U. S. Steel Agri-Chemicals - East St. Louis Facility

An IEPA air emission operating permit No. 163817 AA has been granted for the production facilities.

U. S. Steel Agri-Chemicals - Riverdale Facility

1. An IEPA air emission operating permit No. 054857, 002, 003 has been issued for the production facilities.
2. An NPDES permit has been issued and is under adjudication. It is expected to be resolved shortly.

Universal Atlas Cement Division - Summit Station

A Cook County Certificate of Operation No. 990736 001 I has been issued for the production facilities.

U. S. Steel Products - Howard Avenue Facility

An IEPA air emission operating permit No. 031069 AAU has been granted for the production facilities.

U. S. Steel - Cyclone Fence

1. An IEPA air emission operating permit No. 05090036 has been issued for the production facilities.
2. NPDES permit No. IL 0047775 has been resolved and is about to be issued.

(d) No Pollution Control Board variances have been petitioned for any of the facilities listed in (b) above.

(e) The following is a list of operations for which permits are required but for which permits have not been obtained, together with an explanation of steps being taken or expected to be taken with respect to these operations:

Joliet Plant

The necessary application for an IEPA Water Pollution Control permit will be submitted within six months. Since the NPDES permit has been resolved there does not appear to be any difficulty associated with obtaining this permit.

South Works

The necessary applications for an IEPA Water Pollution Control permit and Wastewater Treatment System Operating Permit will be submitted within six months. Since the NPDES permit has been resolved, there does not appear to be any difficulty associated with obtaining this permit.

Permit applications have not been submitted for the following air emission sources*:

- a) Nos. 3 and 6 boilers
- b) AOD vessel
- c) 52 and 54 inch mill reheat furnace
- d) 30 inch universal mill reheat furnace

Waukegan Plant

Permit applications have not been submitted for the following air emission sources*:

- a) West cleaning house
- b) Tinning department
- (c) Oil tempering
- (d) Galvanizing

U. S. Steel Supply - Chicago Facility

A permit application is being prepared for the air emission sources at this facility*.

- * As a result of existing litigation between U. S. Steel Corporation and the IEPA, U. S. Steel has obtained a stay of the permit requirements and is currently not required to obtain operating permits for any process facility. However, U. S. Steel has put forth a good faith effort by obtaining the permits for the facilities listed in c. above. Because of the existing litigation, it is impossible to indicate at this time what exact steps will be taken to resolve these permits.

(f) The Corporation agrees to make application for all required Illinois Environmental Protection Agency and National Pollutant Discharge Elimination System (NPDES) permits required for existing facilities for each facility or operation owned or controlled by the Corporation in the State of Illinois. All such applications for existing facilities shall be made within a reasonable time following execution of this Agreement, but

in no event later than six months from the date of this Agreement or the expiration of any stay of this requirement, whichever is later. Should any of said applications be denied, the Corporation agrees to take all steps necessary to cure any alleged defects in such application, including resubmittal of the application, appeal from the denial, or petition for a variance from the Illinois Pollution Control Board. Any such steps shall be taken within a reasonable period of time following denial.

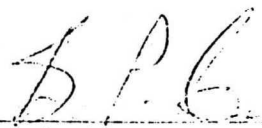
(g) A written Agreement will be executed between the Illinois Industrial Pollution Control Financing Authority and the Corporation which will contain the following clauses, or clauses of similar import.

"Proceeds obtained from the sale of these bonds shall not be disbursed for the construction of the described facility, or any portion thereof, until evidence is presented that the facility, or portion thereof, has received an Illinois Environmental Protection Agency construction, development or operation permit, as required by law or applicable regulations."

"The pollution, which is sought to be controlled by the described facility, shall, for the life of the bonds to be issued, be so controlled as to be in compliance with all currently existing pollution control statutes, ordinances and regulations."

UNITED STATES STEEL CORPORATION

By


S. P. Curtis

Title Vice President - Engineering

(SEAL)

STATE OF PENNSYLVANIA)
)
COUNTY OF ALLEGHENY)

3rd

On this /day of November, 1976 before me appeared S. P. Curtis to me personally known, who being by me duly sworn did say that he is the Vice President-Engineering of UNITED STATES STEEL CORPORATION, and that the seal affixed to said instrument is the corporate seal of said corporation and that said instrument was signed and sealed in behalf of said corporation by authority of its board of directors and said S. P. Curtis acknowledged said instrument to be the free act and deed of said corporation.

(NOTARIAL SEAL)

My Commission Expires: _____

Flora J. Chadde
Notary Public

FLORA J. CHADDE, Notary Public
PITTSBURGH, ALLEGHENY COUNTY
My Commission Expires September 12, 1978